

## **ATTACHMENT A**

### **Remarks**

A new set of claims, claims 11-20, is submitted herewith. The only differences between these claims and those originally filed are that in claims 11 and 20, a clarifying amendment has been made wherein "switching station" has been replaced by "switching means." This change is fully supported by, for example, page 2, lines 20-26, which provide that each base station has a switching function for setting up local connections between terminals distributed in its territory.

Turning to the rejection on prior art, claims 1-10 have been rejected under 35 USC 102(e) as being "unpatentable by Grube et al (6104925)." This rejection is respectfully traversed. The Grube et al patent discloses a telecommunication system for establishing group communications between subscribers affiliated with a terrestrial communication system and subscribers affiliated with a satellite communication system. Thus, one objection of the telecommunication system of the patent is to extend a group communication service offered by the terrestrial communication system to geographic areas not covered by such systems. Consequently, this patent is concerned with network architecture connecting a satellite communication system with a terrestrial communication system through a "systems interface," as illustrated in Figure 2. The result is that a group communication service is provided to the subscribers 14, 48 affiliated with the satellite communication 10.

The terrestrial communication system architecture 12, 14 comprises, as is conventional, base stations 24, 34 and base station controllers 16, 26. Such controllers switch and handle calls from subscribers that are placed in an area covered by a base station connected to the corresponding controller.

The satellite communication architecture 10 comprises one satellite controller 40 for providing services to corresponding subscribers 46, 48 through a satellite 44 (see, e.g., column 5, lines 4-17).

It is respectfully submitted that the Grube et al patent does not disclose or suggest a base station having switching means for switching internal calls between the terminals 20.

The present invention as claimed concerns a communication system architecture comprising base stations, each allocated to a specific territory and each having switching means for setting up local connections between terminals distributed in the specific territory. Consequently, each territory has switching functions that enable it to operate autonomously for internal calls (see, e.g., page 3, lines 4-12 of the instant patent application). This is clearly contrary to conventional or classical mobile telecommunication system architecture.

Further it is respectfully submitted that the Grube et al patent does not describe setting up a connection between one terminal placed in an area covered by a base station 24 and one terminal placed in an area covered by another base station 24, through the satellite 44 only. In contrast, the present invention as claimed concerns a telecommunication system with a plurality of base stations, each allotted to a specific territory and each having switching means for setting up outside connections via the satellite only, for incoming or outgoing calls other than calls internal to the territory.

For the reasons set forth above, it is respectfully submitted that claims 11-20 are patentable over the cited reference and thus allowance of the application in its present form is respectfully solicited.